



Eatonville School District #404

Together, We Commit to Inspiring Lifelong Learners, To Create a Better Future

Krestin Bahr, Superintendent

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

July 23, 2019

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

The Eatonville School District is a small rural school district that encompasses an enormous 445 square miles. Now this is a much different situation than urban districts. The 445 square miles includes Mount Rainier National Park. So, how does this affect our students? Access to telecommunications connects our students to areas they are unable to access by just walking down the street, as most students do not live near a "downtown corridor." We seek equity to provide our students opportunity.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role is the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.



Eatonville School District #404

Together, We Commit to Inspiring Lifelong Learners, To Create a Better Future

Krestin Bahr, Superintendent

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

E-Rate funding allowed our district to update and expand our network. It provided our rural district the funds to upgrade our infrastructure for the first time in ten years. If this E-Rate program was not in place, Eatonville School District network improvements would have been delayed for years. Even delaying network projects by two years impacts the students in high school in a very meaningful way. When rural districts are unable to keep students skills competitive with those in urban districts, there is no time to make-up for opportunities that are lost. Inner city and suburban districts do not face the disparity in the same way. In Washington State, we do not have matching funds.

With the assistance of E-Rate, Eatonville School District was able to purchase updated network switching equipment and wireless access points. These upgrades allow our students to avoid the network traffic bottleneck that was beginning to occur in our district due to aging infrastructure. If E-Rate were removed, our district would have to refocus time and energy away from student learning and place it on finding funds to keep our students competitive in our vast digital age. Funding E-Rate is imperative to small districts like mine.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

Krestin Bahr, Superintendent